

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

RONALD JOHN CALZONE	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action. No. _____
	)	
NANCY HAGAN, et. al	)	
Commissioners and officers of the Missouri	)	
Ethics Commission in their official capacities	)	
thereof,	)	
	)	
Defendants.	)	
_____	)	

**MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY  
INJUNCTION**

Comes now Plaintiff, pursuant to Federal Rule of Civil Procedure 65(b) and moves this Court for entry of a temporary restraining order that prohibits Defendants and their agents from investigating any complaint, or otherwise taking any action—investigative, prosecutorial, or judicial—regarding a claim that Missouri Revised Statutes section 105.470(5)(c) applies against any individual that speaks about questions of public policy or pending legislation with members of the General Assembly or legislative staff without being compensated for that activity.

Likewise, Plaintiff, pursuant to Federal Rule of Civil Procedure 65(b) and moves this Court for entry of a preliminary injunction that prohibits Defendants, their officers, employees, or agents, and those acting on their behalf or in concert from enforcing or threatening to enforce Missouri Revised Statutes section 105.470(5)(c) against any individual that speaks about questions of public policy or pending legislation with members of the General Assembly or legislative staff without being compensated for that activity.

Entry of such relief is appropriate in this case because Plaintiff is likely to succeed on the merits, there is ongoing irreparable harm to Plaintiff, the ongoing harm to Plaintiff absent an injunction outweighs any harm an injunction would cause to Defendants, and the issuance of an injunction is in the public interest.

The factual basis supporting this relief is contained in the Verified Complaint and Plaintiff's suggestions in support of this motion filed herewith. Bond should be waived or set at a nominal amount since there will be no demonstrable harm to Defendants if the requested relief is issued.

WHEREFORE, Plaintiff requests this Court:

- A. Enter a temporary restraining order that prohibits Defendants, their officers, employees, or agents, and those acting on their behalf or in concert with them from investigating any complaint, or otherwise taking any action—investigative, prosecutorial, or judicial—regarding a claim that Missouri Revised Statutes section 105.470(5)(c) applies against any individual that acts without being compensated.
- B. Enter a preliminary injunction that prohibits Defendants, their officers, employees, or agents, and those acting on their behalf or in concert with them from enforcing or threatening to enforce the disclosure requirements of Missouri Revised Statutes section 105.470(5)(c) against those who act without being compensated;
- C. Waive bond or set bond in a nominal amount; and
- D. Allow to Plaintiff such other and further relief as this court deems just and equitable.

Respectfully submitted,



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